

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Northland Cable Television, Inc.)	
)	
Petition for Designation as a Lifeline Broadband Provider)	
)	

**PETITION OF NORTHLAND CABLE TELEVISION, INC., FOR DESIGNATION AS A
LIFELINE BROADBAND PROVIDER
ELIGIBLE TELECOMMUNICATIONS CARRIER**

I. INTRODUCTION

Northland Cable Television, Inc. (“NCTV”), and its wholly owned subsidiaries, Northland Cable Properties, Inc. (“NCPI”), and Northland Cable Ventures LLC (“NCV”), (collectively “Northland”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (“Act”),¹ and Sections 54.201 and 54.202 of the Commission’s rules,² by its undersigned counsel, respectfully submits this Petition for Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier (“LBP ETC”) for the sole purpose of qualifying for Lifeline support for the provision of broadband Internet access service (“BIAS”) in all census blocks where Northland currently offers broadband services as set forth in its most recent FCC Form 477, and listed, more generally by Company, State, City and Census Tract in Exhibit A,

¹ 47 U.S.C. § 214(e)(6).

² 47 C.F.R. §§ 54.201, 54.202.

attached hereto and incorporated herein by reference (the “Designated Service Area”).³ Designation of Northland as a LBP ETC will further the Commission’s overarching policy goals of “ensur[ing] the availability of broadband service for low-income Americans,”⁴ and “encourag[ing] market entry and increas[ing] competition among Lifeline providers.”⁵

Pursuant to the Commission’s *2016 Lifeline Modernization Order*,⁶ as discussed in more detail below, Northland satisfies the requirements for designation as an LBP ETC and is able and prepared to offer Lifeline-supported BIAS service throughout the Designated Service Area. Northland provides facilities-based cable television, Voice over Internet Protocol and Internet access services in smaller cities and rural communities within the states of Alabama, California, Georgia, Idaho, North Carolina, South Carolina, Texas and Washington. Northland began providing Internet access services in 2002. Currently Northland provides BIAS in its service areas to more than 55,000 residential subscribers. Accordingly, Northland is prepared to offer facilities-based BIAS service to qualifying low-income households in the Designated Service Area, and qualifies for expedited review and streamlined treatment of this petition under the *2016 Lifeline Modernization Order*.⁷ Grant of Northland’s request will promote the public interest and particularly the Commission’s primary goal for the newly reformed, BIAS-centric Lifeline program by expanding “the availability of broadband service for low-income Americans.”⁸

³ See *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket No 11-42 et al., Public Notice, DA 16-1118, ¶ 11 (WCB Sept. 30, 2016) (“LBP Public Notice”).

⁴ See *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3971, para. 29. (2016) (“*2016 Lifeline Modernization Order*”).

⁵ See *id.* at 4040, para. 217.

⁶ *Id.* at 4066 para. 282.

⁷ *Id.* at 4065, paras. 277-78.

⁸ See *id.* at 3971, para. 29.

II. OVERVIEW

NCTV and NCPI are incorporated in the State of Washington with principal offices located at 101 Stewart Street, Suite 700, Seattle, Washington, 98101. NCV is a Washington limited liability company also doing business at 101 Stewart Street, Suite 700, Seattle, Washington, 98101. Collectively, the Northland entities have been providing facilities-based Internet access services since 2002 in primarily rural areas and smaller cities in the eight states in which it is authorized to provide cable services. Northland does not receive Lifeline funding for these 55,000 BIAS subscribers, making Northland's application eligible for streamlined processing, which would allow it to soon begin the process of bringing Lifeline benefits to consumers in its service territory. Many of Northland's markets face significant economic challenges. For instance, based on Northland's research, Northland estimates that 25.3%, 18.32% and 18.3% of the homes passed in Northland's Aliceville, Alabama, Swainsboro, Georgia, and Statesboro, Georgia systems, respectively, receive Supplemental Nutrition Assistance Program ("SNAP") benefits.⁹ Many of these beneficiaries are likely current subscribers to one or more of Northland's BIAS services.

Northland is a current participant in the Commission's E-Rate and Rural Healthcare Programs. As such, Northland has substantial experience working with the Commission and the Universal Service Administrative Company ("USAC") and is familiar with universal service policies and procedures.

Accordingly, Northland is an ideal candidate for LBP ETC designation under the Commission's streamlined designation process.

⁹ Calculated as the equivalent percentage of serviceable homes in the Designated Service Area as are in the respective congressional district that are enrolled in the SNAP/SSI programs.

III. NORTHLAND MEETS THE REQUIREMENTS FOR LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

As described below, Northland satisfies all of the statutory and regulatory requirements for designation as a LBP ETC in the proposed Designated Service Area, and has provided a discussion of each requirement below.

A. The FCC Has Authority to Grant the Requested Designation

In the *2016 Lifeline Modernization Order*, the Commission created “a unified, streamlined FCC ETC designation process for providers seeking to receive reimbursement for providing BIAS.”¹⁰ The Commission further found that individual state designations for the LBP ETC designation “would thwart federal universal service goals and broadband competition,” and accordingly preempted such state designations.¹¹ Northland seeks to provide BIAS service to consumers throughout the proposed Designated Service Area. Northland is not subject to state ETC designation jurisdiction, and Northland may seek designation as a LBP ETC for the Designated Service Area directly from the Commission.¹²

B. This Petition Qualifies for Streamlined Treatment

Under section 54.202(d) of the Commission’s revised Lifeline rules, a petition for LBP ETC designation qualifies for streamlined treatment if the provider: (1) serves at least 1,000 non-Lifeline customers with voice telephone service and/or BIAS at the time of the filing; and (2) has offered broadband services to the public for at least the two years preceding the filing, without interruption.¹³

¹⁰ *Id.* at para. 239.

¹¹ *Id.* at para. 229.

¹² *2016 Lifeline Modernization Order*, 31 FCC Rcd at 4044-4063, paras. 229-273.

¹³ 47 C.F.R. § 54.202(d)(1). *See* LBP Public Notice.

Northland meets the requirements for 60-day streamlined LBP ETC designation. As described throughout this petition, Northland has provided, without interruption, facilities-based BIAS service to residential subscribers since 2002. As of the date of this filing, Northland serves over 55,000 non-Lifeline subscribers with broadband speeds in excess of 10/1 Mbps and 150 GB monthly usage. Accordingly, Northland meets the Commission's criteria for receiving streamlined, 60-day "deemed granted" treatment of its LBP ETC application.¹⁴

C. Northland Certifies That It Will Comply With the Service Requirements Applicable to Lifeline Support (47 C.F.R. § 54.202(a)(1))

In accordance with 47 C.F.R. § 54.202(a)(1)(i), Northland hereby certifies that it will comply with all the service requirements, including all applicable minimum service standards, applicable to Lifeline support under the Commission's revised rules.¹⁵

As described throughout this Petition, Northland currently provides BIAS service. At present, Northland offers BIAS services at speeds of up to 100/10 Mbps in certain areas, while all areas within the Designated Service Area are served by at least 24/2 Mbps. Sixty percent (60%) of all new residential BIAS sales are at speeds of 24/2 Mbps or greater. Northland does not currently enforce a fixed maximum monthly data-usage limit and if it does so in the future, Northland agrees that such limit will be equal to or exceed the minimum Lifeline service requirements as determined by the Commission. Northland has established detailed and comprehensive procedures to ensure service is provided in compliance with Lifeline requirements, and, should they be necessary, Northland will implement additional compliance procedures from time to time to further ensure its Lifeline-supported broadband services are offered in compliance with the Commission's rules. Northland commits to providing compliant

¹⁴ See *id.*

¹⁵ 47 C.F.R. § 54.202(a)(1)(i)

BIAS service to all qualified low income consumers throughout its proposed Designated Service Area, even as the minimum service standards for qualifying BIAS are updated annually¹⁶.

D. Northland Will Remain Functional in Emergency Situations (47 C.F.R. § 54.202(a)(2))

In accordance with 47 C.F.R. § 54.202(a)(2), Northland commits to remaining functional in emergency situations, and certifies that the network over which its BIAS service is provided is capable of remaining functional in such situations.¹⁷ Specifically, each of Northland's headends is supported by battery back-up in the event of power outage. Operations during longer term outages are supported by electric generators capable of maintaining uninterrupted headend performance in the event of prolonged power outages. Further, consistent with industry practices, back-up battery power is strategically placed throughout the cable facilities to provide temporary power to the cable plant. At the customer premises, Northland offers battery backed-up modems that provide temporary continued modem performance in the event of a power outage. Northland systems are robust and engineered to maximize its ability to reroute traffic in the event of an emergency or traffic surge. In the event of system outages due to inclement weather or other issues affecting its facilities, Northland has well equipped and experienced technical staff in each system that is tasked to make repairs in emergency situations. Finally, Northland has established relationships with third-party contractors that can provide additional experienced technical staff and equipment when necessary.

E. Northland Will Satisfy Applicable Consumer Protection and Service Quality Standards (47 C.F.R. § 54.202(a)(3))

Northland commits to continuing compliance with all applicable service quality standards and consumer protection rules.¹⁸ Specifically, Northland hereby certifies that it will comply with

¹⁶ See LBP Public Notice.

¹⁷ 47 C.F.R. § 54.202(a)(2); See LBP Public Notice.

¹⁸ 47 C.F.R. § 54.202(a)(3); See LBP Public Notice.

all applicable state and federal consumer protection and service quality standards, that it understands its consumer protection obligations under the Communications Act and its implementing rules, including, but not limited, to any applicable rules regarding unjust or unreasonable practices, discrimination, and relevant enforcement provisions in the Act and the Commission's rules, and is prepared to comply with those obligations and any future amendments or additions thereto.¹⁹

F. Northland Is Financially and Technically Capable of Providing Lifeline Service in Compliance with the Commission's Rules (47 C.F.R. § 54.202(a)(4))

Northland is financially and technically qualified to provide Lifeline-supported BIAS service in compliance with the Commission's rules, including the program's new minimum service standards, throughout the entire Designated Service Area.²⁰ Northland is a privately held company that has been providing cable television services since 1986. Northland's equity ownership has remained virtually unchanged in those thirty years. Northland's principle executive officers have been with Northland for twenty five years or longer. Likewise, executive and senior members of Northland's technical staff have been with Northland for an equivalent period of time. During Northland's thirty years in business, Northland has operated without interruption and has done so in substantial compliance with all applicable federal, state, county and municipal rules and, in the event of any infraction, has used its best efforts to quickly remedy any compliance shortfall.

G. Terms and Conditions of Northland Broadband Internet Access Service Plans (47 C.F.R. § 54.202(a)(6))

Northland plans to offer eligible Lifeline participants in its Designated Service Area all residential broadband products that are offered to the general public, and will do so on the same

¹⁹ See 47 U.S.C. §§ 201, 202, 206-209, 216-217, 222, 225, 251(a)(2), 255, 617, 619; 47 CFR §§ 1.80, 1.701-1.736, 6.3, 6.5, 6.9, 7.1, 7.5, 8.3, 8.5, 8.7, 8.9, 8.12-8.17, 14.20(c), 64.604-64.605.

²⁰ 47 C.F.R. § 54.202(a)(4).

terms and conditions, including any promotional offerings and/or bundled offerings.²¹ Northland will pass the full amount of Lifeline support through to the Lifeline-eligible subscriber, which will appear as a credit on their monthly invoice.²² Northland's current prices, terms and conditions, including promotional offerings, are available on its website at www.yournorthland.com. As described above,²³ all of Northland's BIAS offerings meet the Commission's minimum service standards.

H. Northland Will Advertise the Availability of the Supported Service and the Charges Therefor Through Media of General Distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2))

Northland commits to advertise the availability and cost of its Lifeline BIAS service through media of general distribution.²⁴

Northland will comply with the advertising, marketing, and disclosure requirements set forth in 47 C.F.R. § 54.405.²⁵ Specifically, all of Northland print and other materials used to describe or enroll its subscribers in the Lifeline service offering will indicate, using easily understood language, that (1) Northland low-income targeted service is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.

²¹ 47 C.F.R. § 54.202(a)(6).

²² 47 C.F.R. § 54.403(a)(1).

²³ See *supra* Section C.

²⁴ 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2). As the *2016 Lifeline Modernization Order* explained, "media of general distribution" is any media reasonably calculated to reach the general public or, for a LBP, the specific audience that makes up the demographic for a particular service offering. For example, for a LBP partnering with a school to offer Lifeline-discounted BIAS to that school's community, 'media of general distribution' may include flyers, newspaper advertisements, or local television advertisements in that school's geographic area."

²⁵ 47 C.F.R. § 54.405.

I. Northland Will Comply with All Applicable ETC Obligations (47 U.S.C. § 214(e); 47 C.F.R. §§ 54.201, 54.202)

To protect the integrity of the Lifeline program and guard against waste, fraud, and abuse, Northland will comply with the Commission’s additional ETC obligations outlined in Sections 54.201 and 54.202 as well as those contained in Subpart E of Part 54 of the rules,²⁶ specifically including the rules regarding subscriber eligibility verification, certification and recordkeeping, and auditing requirements. With regard to eligibility verification, Northland will certify and recertify subscribers’ eligibility for the Lifeline program, including verifying and confirming subscribers’ eligibility, in full compliance with existing Section 54.410 of the Commission’s rules until the Commission’s new National Verifier has been launched in the states encompassed in the Designated Service Area. Once the National Verifier is launched in the states encompassed by the Designated Service Area, Northland will enroll subscribers through the National Verifier pursuant to the new provisions of Section 54.410 and in accordance with all enrollment guidance provided by the Commission or USAC.

IV. GRANTING NORTHLAND’S PETITION FOR DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER WILL SERVE THE PUBLIC INTEREST

Section 54.202(b) of the Commission’s rules requires that before granting a petition for ETC designation, the Commission must find that grant of the designation would be in the public interest.²⁷ The Lifeline program serves to further the Act’s goals of achieving “[q]uality services” offered at “just, reasonable, and affordable rates” for low-income consumers.²⁸ In finding that broadband is a supported service for purposes of the Lifeline program, the Commission determined that by expanding “the availability of broadband service for low-income

²⁶ 47 U.S.C. § 214(e); 47 C.F.R. §§ 54.201, 54.202, 54.400 *et seq.*

²⁷ 47 C.F.R. § 54.202(b).

²⁸ 47 U.S.C. § 254(b)(1).

Americans,”²⁹ an ETC is inherently acting in the public interest. Designation of Northland as a LBP ETC will serve the overall public interest, and will benefit low-income consumers in the Designated Service Area by provisioning high quality broadband service at a reasonable cost to Lifeline subscribers.

Northland’s principle service areas are smaller cities and towns and rural unincorporated communities. In Northland’s experience, the cost of broadband services is a barrier to many households within its service areas. By offering a subsidized broadband service, Northland expects that many additional households will be able to afford broadband services, thus furthering the Commission’s goal of reaching those American households with limited financial means.

V. ANTI-DRUG ABUSE CERTIFICATION

Northland certifies that no party to this Petition is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

VI. CONCLUSION

Northland certifies that its Petition for LBP ETC Designation fully satisfies the conditions set forth in the Communications Act, the Commission’s rules pertaining to Lifeline, and the *2016 Lifeline Modernization Order*. Accordingly, Northland respectfully requests expeditious approval of its LBP ETC Designation Petition under the Commission’s 60-day streamlined review process so that Northland may provide BIAS service to eligible low-income consumers in the Designated Service Area.

²⁹ See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket Nos. 12-23, 11-42, 03-109, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6673-74, paras. 33-34 (2012) (“*2012 Lifeline Reform Order*”).

Respectfully submitted,



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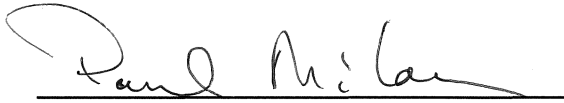
*Counsel to Northland Cable Television, Inc.,
Northland Cable Properties, Inc. and
Northland Cable Ventures LLC*

December 14, 2016

**CERTIFICATION OF
NORTHLAND CABLE TELEVISION, INC., NORTHLAND CABLE
PROPERTIES, INC., AND NORTHLAND CABLE VENTURES LLC.**

I, Paul Milan, state that I am a Vice President and the General Counsel of Northland Cable Television, Inc., Northland Cable Properties, Inc. and Northland Cable Ventures LLC ("Petitioners"); that I am authorized to make this Certification on behalf of Petitioners; that the foregoing filing was prepared under my direction and supervision; and that the statements made in the foregoing filing with respect to Petitioners are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of December, 2016.

A handwritten signature in black ink, appearing to read "Paul Milan", is written over a horizontal line.

Paul Milan
Northland Cable Television, Inc.
Northland Cable Properties, Inc.
Northland Cable Ventures LLC

EXHIBIT A

Designated Service Area

Exhibit A
Designated Service Area
Lifeline Broadband Provider Application of Northland Cable Television, Inc., Northland Cable Properties, Inc., and Northland Cable Ventures LLC

A. Northland Cable Television, Inc., (NCTV)

Company	State	System	Census Tract	Company	State	System	Census Tract
NCTV	AL	Aliceville	01075030200	NCTV	GA	Vidalia	13209950300
NCTV	AL	Aliceville	01107050000	NCTV	GA	Vidalia	13279970100
NCTV	AL	Aliceville	01107050100	NCTV	GA	Vidalia	13279970200
NCTV	AL	Aliceville	01107050300	NCTV	GA	Vidalia	13279970300
NCTV	AL	Aliceville	01107050400	NCTV	GA	Vidalia	13279970400
NCTV	CA	Oakhurst	06039000102	NCTV	GA	Vidalia	13279970500
NCTV	CA	Oakhurst	06039000103	NCTV	NC	Highlands	37175960600
NCTV	CA	Oakhurst	06039000104	NCTV	NC	Highlands	37099950800
NCTV	CA	Oakhurst	06039000106	NCTV	NC	Highlands	37099950900
NCTV	CA	Oakhurst	06039000108	NCTV	NC	Highlands	37113970501
NCTV	CA	Oakhurst	06039000109	NCTV	NC	Highlands	37113970502
NCTV	CA	Mount Shasta	06089012500	NCTV	SC	Greenwood	45001950100
NCTV	CA	Mount Shasta	06093000300	NCTV	SC	Greenwood	45001950400
NCTV	CA	Mount Shasta	06093000701	NCTV	SC	Greenwood	45001950500
NCTV	CA	Mount Shasta	06093000702	NCTV	SC	Clemson	45007010600
NCTV	CA	Mount Shasta	06093000703	NCTV	SC	Clemson	45007010700
NCTV	CA	Mount Shasta	06093000900	NCTV	SC	Greenwood	45037970201
NCTV	CA	Mount Shasta	06093001000	NCTV	SC	Greenwood	45037970202
NCTV	CA	Mount Shasta	06093001100	NCTV	SC	Greenwood	45037970300
NCTV	CA	Mount Shasta	06093001200	NCTV	SC	Greenwood	45047970101
NCTV	GA	Statesboro	13031110100	NCTV	SC	Greenwood	45047970102
NCTV	GA	Statesboro	13031110200	NCTV	SC	Greenwood	45047970201
NCTV	GA	Statesboro	13031110300	NCTV	SC	Greenwood	45047970202
NCTV	GA	Statesboro	13031110401	NCTV	SC	Greenwood	45047970301
NCTV	GA	Statesboro	13031110403	NCTV	SC	Greenwood	45047970302
NCTV	GA	Statesboro	13031110404	NCTV	SC	Greenwood	45047970400
NCTV	GA	Statesboro	13031110500	NCTV	SC	Greenwood	45047970500
NCTV	GA	Statesboro	13031110601	NCTV	SC	Greenwood	45047970600
NCTV	GA	Statesboro	13031110602	NCTV	SC	Greenwood	45047970701
NCTV	GA	Statesboro	13031110700	NCTV	SC	Greenwood	45047970702
NCTV	GA	Statesboro	13031110800	NCTV	SC	Greenwood	45047970800
NCTV	GA	Swainsboro	13107970300	NCTV	SC	Greenwood	45047970900
NCTV	GA	Swainsboro	13107970400	NCTV	SC	Greenwood	45047971000
NCTV	GA	Swainsboro	13107970600	NCTV	SC	Greenwood	45059920201
NCTV	GA	Vidalia	13209950100	NCTV	SC	Greenwood	45059920202
NCTV	GA	Vidalia	13209950200	NCTV	SC	Greenwood	45059921001

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Company	State	System	Census Tract	Company	State	System	Census Tract
NCTV	SC	Clemson	45073030100	NCTV	TX	Marble Falls	48053960800
NCTV	SC	Clemson	45073030300	NCTV	TX	Marble Falls	48097000200
NCTV	SC	Clemson	45073030401	NCTV	TX	Stephenville	48143950201
NCTV	SC	Clemson	45073030402	NCTV	TX	Stephenville	48143950202
NCTV	SC	Clemson	45073030500	NCTV	TX	Stephenville	48143950300
NCTV	SC	Clemson	45073030601	NCTV	TX	Stephenville	48143950400
NCTV	SC	Clemson	45073030602	NCTV	TX	Stephenville	48143950500
NCTV	SC	Clemson	45073030701	NCTV	TX	Stephenville	48143950600
NCTV	SC	Clemson	45073030702	NCTV	TX	Mexia	48161000100
NCTV	SC	Clemson	45073030800	NCTV	TX	Mexia	48161000200
NCTV	SC	Clemson	45073030902	NCTV	TX	Mexia	48161000300
NCTV	SC	Clemson	45073031000	NCTV	TX	Mexia	48161000600
NCTV	SC	Clemson	45073031100	NCTV	TX	Mexia	48161000700
NCTV	SC	Clemson	45077010200	NCTV	TX	Mexia	48161000900
NCTV	SC	Clemson	45077010300	NCTV	TX	Mexia	48185180301
NCTV	SC	Clemson	45077010401	NCTV	TX	Mexia	48225950300
NCTV	SC	Clemson	45077010402	NCTV	TX	Mexia	48225950400
NCTV	SC	Clemson	45077010403	NCTV	TX	Mexia	48225950500
NCTV	SC	Clemson	45077010502	NCTV	TX	Mexia	48293970200
NCTV	SC	Clemson	45077010700	NCTV	TX	Mexia	48293970300
NCTV	SC	Clemson	45077010803	NCTV	TX	Mexia	48293970400
NCTV	SC	Clemson	45077011001	NCTV	TX	Mexia	48293970500
NCTV	SC	Clemson	45077011002	NCTV	TX	Mexia	48293970600
NCTV	SC	Clemson	45077011101	NCTV	TX	Mexia	48293970700
NCTV	SC	Clemson	45077011102	NCTV	TX	Marble Falls	48299970100
NCTV	SC	Clemson	45077011103	NCTV	TX	Marble Falls	48299970200
NCTV	SC	Clemson	45077011202	NCTV	TX	Marble Falls	48299970300
NCTV	SC	Clemson	45077011203	NCTV	TX	Marble Falls	48299970400
NCTV	SC	Clemson	45077011204	NCTV	TX	Marble Falls	48299970500
NCTV	SC	Clemson	45077011205	NCTV	TX	Marble Falls	48299970600
NCTV	SC	Greenwood	45081960201	NCTV	TX	Mexia	48313000200
NCTV	SC	Greenwood	45081960202	NCTV	TX	Mexia	48313000400
NCTV	TX	Marble Falls	48031950200	NCTV	WA	Moses Lake	53001950300
NCTV	TX	Marble Falls	48053960200	NCTV	WA	Moses Lake	53001950400
NCTV	TX	Marble Falls	48053960300	NCTV	WA	Moses Lake	53001950500
NCTV	TX	Marble Falls	48053960400	NCTV	WA	Moses Lake	53021020800
NCTV	TX	Marble Falls	48053960500	NCTV	WA	Moses Lake	53025010100
NCTV	TX	Marble Falls	48053960600	NCTV	WA	Moses Lake	53025010200
NCTV	TX	Marble Falls	48053960700	NCTV	WA	Moses Lake	53025010300

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Company	State	System	Census Tract
NCTV	WA	Moses Lake	53025010400
NCTV	WA	Moses Lake	53025010600
NCTV	WA	Moses Lake	53025010700
NCTV	WA	Moses Lake	53025010800
NCTV	WA	Moses Lake	53025010901
NCTV	WA	Moses Lake	53025010902
NCTV	WA	Moses Lake	53025011000
NCTV	WA	Moses Lake	53025011100
NCTV	WA	Moses Lake	53025011200
NCTV	WA	Moses Lake	53025011300

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B. Northland Cable Properties, Inc.

Company	State	System	Census Tract
NCPI	ID	Sandpoint	16017950200
NCPI	ID	Sandpoint	16017950300
NCPI	ID	Sandpoint	16017950400
NCPI	ID	Sandpoint	16017950500
NCPI	ID	Sandpoint	16017950700
NCPI	ID	Sandpoint	16017950800
NCPI	ID	Sandpoint	16017950900
NCPI	NC	Forest City	37045951400
NCPI	NC	Forest City	37045951501
NCPI	NC	Forest City	37071030802
NCPI	NC	Forest City	37089930100
NCPI	NC	Forest City	37161960100
NCPI	NC	Forest City	37161960200
NCPI	NC	Forest City	37161960300
NCPI	NC	Forest City	37161960400
NCPI	NC	Forest City	37161960500
NCPI	NC	Forest City	37161960600
NCPI	NC	Forest City	37161960700
NCPI	NC	Forest City	37161960800
NCPI	NC	Forest City	37161960900
NCPI	NC	Forest City	37161961000
NCPI	NC	Forest City	37161961101
NCPI	NC	Forest City	37161961102
NCPI	NC	Forest City	37161961200

Exhibit A

Designated Service Area

Lifeline Broadband Provider Application of Northland Cable Television, Inc., Northland Cable Properties, Inc., and Northland Cable Ventures LLC

C. Northland Cable Ventures LLC

Company	State	System	Census Tract
NCV	TX	Lamesa	48115950401
NCV	TX	Lamesa	48115950402
NCV	TX	Lamesa	48115950500
NCV	TX	Corsicana	48217960700
NCV	TX	Corsicana	48217960800
NCV	TX	Corsicana	48217960900
NCV	TX	Corsicana	48217961000
NCV	TX	Corsicana	48217961100
NCV	TX	Corsicana	48349970200
NCV	TX	Corsicana	48349970300
NCV	TX	Corsicana	48349970500
NCV	TX	Corsicana	48349970700
NCV	TX	Corsicana	48349970800
NCV	TX	Corsicana	48349970900